

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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THE AMERICAN AUTOMOBILE
ASSOCIATION, INC.,

Plaintiff,

v.

STEVE'S TRIPLE A TOWING and
STEVEN BALINT,

Defendants.
----- x

:
: CV-10-04141 (JFB) (ETB)
:
:
:

: **DECLARATION OF PETER**
: **SAHARKO IN SUPPORT OF**
: **PLAINTIFF'S MOTION FOR**
: **ATTORNEYS' FEES AND**
: **COSTS**
:
:

: **ECF CASE**
:

PETER SAHARKO declares pursuant to 28 U.S.C. 1746:

1. I am an attorney with the law firm of Covington & Burling LLP, counsel for Plaintiff The American Automobile Association, Inc. ("AAA"). I am a member in good standing of the District of Columbia and Virginia bars. I have personal knowledge of all matters stated herein.

2. I have reviewed the books and records of Covington & Burling with respect to the attorneys' fees and costs incurred from the beginning of this proceeding through November 12, 2010 in connection with this case, the details of which are summarized below.

3. <u>Attorney</u>	<u>Time</u>	<u>Rate</u> ¹	<u>Amount</u>
N. Roman	1.2	\$592	\$710.40
M. Nicholson	6.375	\$480	\$3,060.00
P. Saharko	7.4/13.1	\$284/\$308 ²	\$6,121.00
G. Hoff Varner	4.8/2.8	\$400/\$416	\$3,074.40
<u>Attorneys' fees accrued, to November 12:</u>			<u>\$12,965.80</u>
<u>Costs</u>			
Filing Fees			\$350.00
Process Servers			\$375.00
Long Distance Charges			\$2.34
Local Transportation			\$4.50
Document Scanning			\$8.25
Document Duplicating			\$93.15
Federal Express Charges			\$19.50
<u>Costs accrued, to November 12:</u>			<u>\$852.74</u>
Total costs and fees accrued, to November 12:			\$13,818.54

¹ These rates reflect a twenty percent reduction in Covington & Burling's standard fees.

² The change in billing rate reflects a change in associate seniority during the pendency of the proceeding.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 22, 2010 in Washington, D.C.

A handwritten signature in black ink, appearing to read 'Peter Saharko', is written over a horizontal line.

Peter Saharko

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